

LYDIA BUNDY  
JANUARY 02, 2025

JOB NO. 1356070

1 UNITED STATES BANKRUPTCY COURT

2 DISTRICT OF UTAH

3 Case No. 24-23530

Chapter 7

4 VIDEOTAPED RULE 2004 EXAMINATION OF LYDIA BUNDY  
5 Thursday, January 2, 2025

6  
7 In re AMMON EDWARD BUNDY  
8

9  
10 PURSUANT TO NOTICE AND AGREEMENT, the  
11 videotaped Rule 2004 Examination of LYDIA BUNDY, was  
12 taken at the Hyatt Place, 1819 S. 120 East, St. George,  
13 UT 84790, per stipulation of all parties, on behalf of  
14 St. Luke's Health System, Ltd., et al., on Thursday,  
15 January 2nd, 2025, at 8:46 a.m., before Traci Booth,  
16 Registered Professional Reporter and Realtime Certified  
17 Reporter within the States of Colorado and Utah.  
18  
19  
20  
21  
22  
23  
24  
25

LYDIA BUNDY  
JANUARY 02, 2025

JOB NO. 1356070

P R O C E E D I N G S

(Deposition Exhibit No. 1 is premarked.)

VIDEOGRAPHER: Good morning. We are now on the record on January 2nd, 2025, at 8:46 a.m. Mountain Time, to begin the Rule 2004 Examination of Lydia Bundy, Case No. 24-23530, in the United States Bankruptcy Court, District of Utah.

We are located at 1819 South 120 East, St. George, Utah 84790.

My name is Dawn Beck, Legal Video Specialist, on behalf of Steno.

The court reporter is Traci Booth, also here on behalf of Steno.

Will the counselor, please state your appearance for the record and whom you represent.

MR. STIDHAM: Eric Stidham on behalf of the creditors -- the St. Luke's creditors and also Natasha Erickson and Tracy Jungman.

VIDEOGRAPHER: Thank you.

Would the court reporter please administer the oath.

LYDIA BUNDY,  
having been first duly sworn, was examined and testified as follows:

///

LYDIA BUNDY  
JANUARY 02, 2025

JOB NO. 1356070

1 EXAMINATION

2 BY MR. STIDHAM:

3 Q And, Ms. Bundy, as we mentioned before, my  
4 name is Eric Stidham. I am here on behalf of some  
5 creditors as it relates to Mr. Ammon Bundy's  
6 bankruptcy.

7 Do you understand that?

8 A. Yes.

9 Q. Okay. And let me start off with first what  
10 we have marked as Exhibit No. 1.

11 I'd ask you to take a look at that.

12 Have you seen Exhibit No. 1 before, a copy of  
13 it?

14 A. Just right now.

15 Q. Well, did you receive a copy in the mail?

16 MR. BUNDY: It's this.

17 A. Uhm, yeah. Yes.

18 MR. STIDHAM: Okay. And, Mr. Bundy, I  
19 appreciate you're just assisting. It'll just get  
20 problematic if you prompt her with any answer, but  
21 appreciate your effort there.

22 Q. (BY MR. STIDHAM) So you have received a copy  
23 of Exhibit No. 1 before; is that correct?

24 A. Yes.

25 Q. Okay. And did you review Exhibit No. 1 when

LYDIA BUNDY  
JANUARY 02, 2025

JOB NO. 1356070

1 some designations there relating to the filing of that  
2 document in the Bankruptcy Court.

3 But at the top it says, Document page 10 of  
4 14. Is that what you're looking at?

5 A. Yes.

6 Q. And do you see below there, there's a list on  
7 that page, continuing on to the next page, of about 14  
8 different items -- 14 different categories, excuse me,  
9 of documents that were requested?

10 A. Yes.

11 Q. And did you read each of these 14 categories?

12 A. Yes.

13 Q. Okay. Did you bring with you any documents?

14 A. I do not have any of these documents.

15 Q. Okay. And that's the next question.

16 Do you have -- you say you do not have any of  
17 the documents, correct?

18 A. Yes.

19 Q. Are there any business records, to your  
20 knowledge, that are kept for the Bundy's Brazilian  
21 Steakhouse?

22 A. Can you say that again?

23 Q. Sure. There's a Brazilian -- there's a  
24 Bundy's Brazilian Steakhouse, correct?

25 A. Yes.

LYDIA BUNDY  
JANUARY 02, 2025

JOB NO. 1356070

1 Q. Am I saying that correctly --

2 A. Yes.

3 Q. -- the name of the restaurant?

4 A. Uh-hmm.

5 Q. Are there any documents that relate to -- to  
6 your knowledge, are there any documents kept by the  
7 steakhouse?

8 A. No.

9 Q. So the steakhouse keeps no financial  
10 documents regarding anything?

11 A. Not with this person, no.

12 Q. Well, did -- I'm -- let me step back.

13 Do you understand that you are listed as a  
14 d/b/a for the Brazilian Steakhouse?

15 A. Yes.

16 Q. Do you understand -- can you tell me what  
17 your understanding is of the significance of being  
18 listed as a d/b/a for a business?

19 A. I represent it. I represent Bundy Brazilian  
20 Steakhouse.

21 Q. Well, isn't it a fact that you are Bundy's  
22 Brazilian Steakhouse?

23 A. I am the representative of it, yes.

24 Q. Is there -- do you understand what a  
25 corporate entity is?

LYDIA BUNDY  
JANUARY 02, 2025

JOB NO. 1356070

1 Like a corporation or an LLC, things like  
2 that, do you understand those?

3 A. Yes.

4 Q. And is Bundy's Brazilian Steakhouse run  
5 through a corporate entity?

6 A. Yes.

7 Q. What corporate entity is it run through?

8 A. Bundy's Industries.

9 Q. Bundy Industries.

10 And you're a manager of Bundy's Industries,  
11 correct?

12 A. Yes.

13 Q. All right. But is there anywhere -- to your  
14 knowledge, is there any filing that's been made  
15 regarding Bundy's Brazilian Steakhouse that indicates  
16 that Bundy Industries is d/b/a Bundy's Brazilian  
17 Steakhouse?

18 A. Yes.

19 Q. So you think there's a corporate filing  
20 indicating that Bundy Industries is d/b/a Bundy's  
21 Brazilian Steakhouse?

22 A. Yes. If I understand correctly, yes.

23 Q. Okay. Were you involved at all in putting  
24 together the corporate documents relating to the  
25 business, Bundy Industries or Bundy's Brazilian

LYDIA BUNDY  
JANUARY 02, 2025

JOB NO. 1356070

1 Steakhouse?

2 A. That was both me and my husband.

3 Q. Okay. Is there -- well, let me just pause  
4 there for a second, and then we'll jump back in.

5 I want to get back just to the document that  
6 is in front of you.

7 So with regard to the document ...

8 MR. STIDHAM: Can we go off the record for  
9 just a second?

10 MR. BUNDY: Yes, please.

11 Yes, we have records --

12 VIDEOGRAPHER: Sorry. We are going off the  
13 record.

14 (Whereupon, a discussion was held off the record.).

15 VIDEOGRAPHER: We are back on the record at  
16 8:56 a.m.

17 Q. (BY MR. STIDHAM) So, Ms. Bundy, picking up  
18 kind of where we were at before the break, did you have  
19 a chance to see whether or not you had access or  
20 ability to access any of the documents that are listed  
21 in the 14 categories on page 10 and 11 of Exhibit 1?

22 A. Yes.

23 Q. Okay. And what efforts did you make to get  
24 those documents?

25 A. We searched.

LYDIA BUNDY  
JANUARY 02, 2025

JOB NO. 1356070

1 Q. You searched your house?

2 A. We searched the business. We searched it  
3 all, but we don't have the documents you need.

4 Q. Okay. So when you say you searched the  
5 business, and you say we don't have the documents, what  
6 you need, can you explain what you mean to me -- what  
7 you mean by that?

8 A. We looked into it, I guess is the best way to  
9 put it.

10 Q. Did you physically go look through records to  
11 see whether or not there were records?

12 A. (Witness nodding).

13 Q. So where did you look, I guess, physically?  
14 Are the corporate records held at a location  
15 for the Bundy's Steakhouse?

16 A. In a safe, yeah.

17 Q. In a safe on -- at your residence?

18 A. Yes.

19 Q. Okay. And then just, again, are there  
20 documents relating to Bundy Industries kept in the same  
21 location, in a safe on your residence?

22 A. Yes.

23 Q. Okay. Are -- is there any other place where  
24 Bundy Industry records are kept, other than the safe on  
25 your residence?



LYDIA BUNDY  
JANUARY 02, 2025

JOB NO. 1356070

1 A. No.

2 Q. Okay. Are you also involved with the  
3 business, Bundy's -- Bundy's -- I forget -- the Bundy  
4 Motor -- the exhaust brake business?

5 A. No.

6 Q. Okay. Can you tell me what the name of the  
7 exhaust brake business is?

8 A. Uhm, I think Sentimental or something like  
9 that. Sentimental Brakes or something like that.

10 Q. Okay. All right. So, day-to-day, what --  
11 what activities are you involved in relating to Bundy  
12 Industries or the Bundy's Steakhouse?

13 A. Just Bundy's Steakhouse.

14 Q. Okay. And what do you do as it relates to  
15 Bundy's Steakhouse? What are your duties?

16 A. I do the quarterly filing --

17 Q. Okay.

18 A. -- and take care of our catering trailer.

19 Q. Okay. When you say the "quarterly filing,"  
20 what are you referring to?

21 A. For taxes.

22 Q. Okay. So the quarterly tax payments?

23 A. Uh-hmm.

24 Q. With both State and Federal?

25 A. Yes.

LYDIA BUNDY  
JANUARY 02, 2025

JOB NO. 1356070

1 Q. And then you said you were involved, if I  
2 understood correctly, with the catering business?

3 A. Uh-hmm.

4 Q. What is your involvement with the catering  
5 business?

6 A. I call the people and get their food to them  
7 and take the trailer to them, and, uhm, manage the  
8 employees on site --

9 Q. Okay.

10 A. -- at the caterings, yeah.

11 Q. Okay. With the operations at the Bundy  
12 Steakhouse location, are you involved with those --

13 A. No, not as much.

14 Q. -- other than the catering?

15 A. Not as much.

16 Q. Do you have a title, a job title, as it  
17 relates to the Bundy Steakhouse business?

18 A. Catering manager.

19 Q. Catering manager.

20 Do you have a title as it relates to Bundy  
21 Industries?

22 A. Just partner.

23 Q. Okay. And do you have some ownership  
24 interest in Bundy Industries?

25 A. Just half and half with my husband. That's

LYDIA BUNDY  
JANUARY 02, 2025

JOB NO. 1356070

1 about it.

2 Q. Okay. And what does Bundy Industries do?

3 A. We -- it's just the parent company for  
4 Bundy's Brazilian Steakhouse.

5 Q. Okay. Does Bundy Industries engage in any  
6 business other than Bundy's Brazilian Steakhouse?

7 A. No.

8 Q. Are you involved in any other family  
9 businesses, other than what you've already described to  
10 me related to the catering business and having some  
11 ownership in Bundy Industries?

12 A. No, sir.

13 Q. Okay. So we've already -- I've already asked  
14 you a number of questions, but let me just back up and  
15 talk about some of kind of the rules of deposition.

16 Have you ever had your deposition done --  
17 taken before today?

18 A. No.

19 Q. Okay. Well, you're doing a good job, but  
20 just a couple of rules to keep in mind. If I ask you a  
21 question, and for any reason you don't understand it,  
22 please ask me to rephrase it; is that fair?

23 A. Yes.

24 Q. If I ask you a question, and you respond,  
25 I'll assume that you understood the question; is that

LYDIA BUNDY  
JANUARY 02, 2025

JOB NO. 1356070

1 fair?

2 A. Yes.

3 Q. Okay. And as we discussed, I understand that  
4 there might be a need for you to take a break for some  
5 reason.

6 A. Yes.

7 Q. And if you do, just tell me, and we'll take a  
8 break, and get done what you need to get done.

9 A. Okay.

10 Q. Okay.

11 A. I want to take a break (whispering).

12 Q. So with regard to -- can I ask you what your  
13 educational background is, just at a high level?

14 A. Uhm, went to tech school.

15 Q. Okay. So you graduated from high school, I  
16 assume.

17 A. Uh-hmm.

18 Q. When did you graduate from high school?

19 2021, I think.

20 A. '19.

21 Q. 2019.

22 And where did you graduate from?

23 A. Hurricane High.

24 Q. Okay. And did you have any formal education  
25 after high school?

LYDIA BUNDY  
JANUARY 02, 2025

JOB NO. 1356070

1 A. Just tech school.

2 Q. Okay. And what tech school did you attend?

3 A. Dixie.

4 Q. Dixie. And did you graduate from Dixie?

5 A. Yes.

6 Q. And what was your degree from Dixie?

7 A. Diesel mechanics.

8 Q. Okay.

9 THE DEPONENT: I might need a break.

10 MR. STIDHAM: Okay. Let's take a break.

11 Let's go off the record.

12 VIDEOGRAPHER: We are going off the record at  
13 9:02 a.m.

14 (Recess taken from 9:02 a.m. to 9:12 a.m.)

15 VIDEOGRAPHER: We are back on the record at  
16 9:12 a.m.

17 Q. (BY MR. STIDHAM) So, Ms. Bundy, kind of going  
18 back to kind of the -- your educational background,  
19 your business background, let me just ask you a couple  
20 of questions so I can understand your business  
21 experience, if I could.

22 A. I would like to plead the Fifth and get an  
23 attorney so we can better answer your questions.

24 Q. Is that for all the questions that remain?

25 A. That's -- yeah.

LYDIA BUNDY  
JANUARY 02, 2025

JOB NO. 1356070

1 Yeah.

2 Q. Okay. And this is -- I want to respect the  
3 Fifth Amendment. Part of what I have to do is ask you  
4 some questions so that you actually plead the Fifth.

5 It's problematic if you make a blanket  
6 statement. My plan would be -- just to be up front  
7 with you, I'm going to ask you some questions, and if  
8 you plead the Fifth, I'm not going to ask you every --  
9 I'm going to try and kind of be reasonable about it.  
10 I'm not going to ask you every potential question, but  
11 I want to ask you about a couple of categories, and  
12 then if you plead the Fifth, I will respect that, and  
13 we'll deal with that later; is that fair?

14 A. Yes.

15 Q. Okay. So, Ms. Bundy, would you plead -- is  
16 it your -- are you pleading the Fifth Amendment  
17 regarding any questions regarding the finances and  
18 operation of the business, Bundy Brazilian Steakhouse?

19 A. Uhm, yes.

20 No.

21 Q. Which is it, ma'am?

22 THE DEPONENT: Help me a little bit.

23 MR. BUNDY: Just like an attorney.

24 A. I'd just like an attorney.

25 MR. BUNDY: So we can figure out, you know --

LYDIA BUNDY  
JANUARY 02, 2025

JOB NO. 1356070

1 A. I want to get you the right answers and solid  
2 answers.

3 Q. (BY MR. STIDHAM) Fair enough.

4 MR. BUNDY: We want to do this right.

5 MR. STIDHAM: I'm sorry, Mr. Bundy.

6 MR. BUNDY: I'm sorry.

7 Q. (BY MR. STIDHAM) But, ma'am, I just need to  
8 establish on the record that you're pleading the Fifth  
9 Amendment.

10 A. Yes.

11 Q. Okay. So let me ask that again and give you  
12 a chance to respond.

13 And my plan would be -- I'm going to ask you  
14 a couple more categories, and then maybe have a little  
15 bit more dialogue with you, just to make sure.

16 What I don't want to have happen, ma'am, is  
17 that I misunderstand something that you're willing to  
18 testify about to today, okay, and that I create some  
19 kind of gap what you're pleading the Fifth Amendment on  
20 what areas I might want to inquire into.

21 Do you understand that?

22 A. Yes.

23 Q. Okay. So, again, with regard to -- are you  
24 saying that you're pleading the Fifth Amendment with  
25 regard to any questions that relate to the business and

LYDIA BUNDY  
JANUARY 02, 2025

JOB NO. 1356070

1 finances of the Bundy Brazilian Steakhouse?

2 A. Yes.

3 Q. Are you pleading the Fifth Amendment with  
4 regard to any questions that relate to business  
5 dealings with Mr. Ammon Bundy?

6 A. Yes.

7 Q. Okay. Are you intending to plead the Fifth  
8 Amendment regarding the finances and business of Bundy  
9 Industries?

10 A. Yes.

11 Q. Are you intending to plead the Fifth  
12 Amendment regarding any agreements with Mr. Bundy  
13 relating to loans of any kind?

14 A. Yes.

15 Q. Okay. Are you intending to plead the Fifth  
16 Amendment with regard to your knowledge relating to  
17 financial transactions between your husband and  
18 Mr. Ammon Bundy?

19 A. Yes.

20 Q. Are you intending to -- are you pleading the  
21 Fifth Amendment with regard to any and all financial  
22 transactions between yourself and Mr. Ammon Bundy?

23 A. Yes.

24 Q. Are you intending to plead the Fifth  
25 Amendment regarding any financial transactions,



LYDIA BUNDY  
JANUARY 02, 2025

JOB NO. 1356070

1 including loans or salary, that is being paid to  
2 Mr. Bundy through one of the businesses that your  
3 husband is involved in?

4 A. Yes.

5 Q. Through any of the businesses, excuse me?

6 A. Yes.

7 Q. You just need to speak up, ma'am. You're a  
8 little quiet.

9 A. Yes.

10 Q. Okay, thank you.

11 So is it -- in effect, and I don't want to  
12 waste our time. As I told you before, I don't want to  
13 be overly technical and ask you every single Fifth  
14 Amendment -- every single question I might potentially  
15 ask and have you pled the Fifth Amendment, but is it  
16 fair to say that your intention is to plead the Fifth  
17 Amendment regarding any question I might be asking here  
18 today in this deposition going forward?

19 A. Yes.

20 Q. Okay. All right. With that in mind -- well,  
21 any other questions, ma'am, before we go off the  
22 record?

23 A. No.

24 Q. Okay. I will reach out to you and your  
25 husband.

LYDIA BUNDY  
JANUARY 02, 2025

JOB NO. 1356070

1 I will send in -- we can go off the record,  
2 but, if it's okay, I would like to exchange emails and  
3 be fine with you -- if it's fine with you, Mr. Bundy  
4 just so we can coordinate things going forward.

5 Is that understood?

6 A. Yes.

7 Q. All right. Again, just once for the record,  
8 and I apologize for doing this, I just need to try and  
9 create a relatively clear transcript on these issues.

10 Are there any questions at all regarding any  
11 categories relating to Mr. Ammon Bundy that you would  
12 be willing to testify to today without pleading the  
13 Fifth Amendment?

14 A. No.

15 MR. STIDHAM: Okay. All right. With that I  
16 think we can go off the record.

17 VIDEOGRAPHER: This concludes the examination  
18 of Lydia Bundy on January 2nd, 2025.

19 We are going off the video record, and the  
20 time is 9:17 a.m. Mountain Time.

21 (Whereupon, the within proceedings were adjourned at  
22 9:17 a.m. on January 2, 2025.)

23 \* \* \*

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LYDIA BUNDY  
JANUARY 02, 2025

JOB NO. 1356070

REPORTER'S CERTIFICATE

STATE OF UTAH )  
 ) ss  
COUNTY OF WASHINGTON )

That prior to being examined, the witness was, by me, duly sworn to testify to the truth, the whole truth, and nothing but the truth.

That I thereafter transcribed my said shorthand notes into typewriting, and that the typewritten transcript of said deposition is a complete, true, and accurate transcription of my said shorthand notes taken at said time.

I further certify that I am not a relative or employee of an attorney or counsel of any of the parties, nor a relative or employee of any attorney or counsel involved in said action, nor a person financially interested in the action.

IN WITNESS WHEREOF, I have hereunto set my hand in my office in the County of Washington, State of Utah, this 2nd day of January, 2025.

  
Traci L. Booth, RPR, CRCR